

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS (LULAC), et al.,

Plaintiffs,

v.

GREG ABBOTT, et al.,

Defendants.

Civil Action No. 3:21-cv-259
(DCG-JES-JVB)
(consolidated cases)

UNITED STATES' SECOND DESIGNATION OF TESTIFYING EXPERT

Pursuant to this Court's December 17, 2021 Scheduling Order, ECF No. 96, as amended by the June 9, 2022 Modification Order, ECF No. 325, the United States hereby files the designation of a testifying rebuttal expert.¹

Designation of Testifying Rebuttal Expert

1. **Dr. Jonathan Rodden.** Dr. Rodden is a Professor of Political Science at Stanford University, the Director of the Stanford Spatial Social Science Lab, and a senior fellow at the Stanford Institute for Economic Policy Research and the Hoover Institution. His scholarly research focuses on voting, demographics, geography, and aspects of election administration, including registration, the structure of precincts, redistricting, and methods of voting. Dr. Rodden is expected to testify to rebut the expert report of Mr. Sean Trende relating to the role that partisanship and race played in 2021 Congressional redistricting in Texas.

¹ Upon learning of an agreement between Defendants and a subset of Plaintiffs permitting service of an expert report by Mr. Sean Trende after the July 18 responsive expert deadline, the United States requested that Defendants permit the service of rebuttal expert reports responding to Mr. Trende's report by August 1, 2022. Defendants agreed to this request. *See* Email from Jacki DiSorbo to Plaintiffs' Counsel (July 19, 2022) (Ex. 1).

Also pursuant to this Court's December 17, 2021 Scheduling Order, the United States shall on this day serve on all parties, but not file, the materials required by Federal Rule of Civil Procedure 26(a)(2)(B).

Date: August 1, 2022

JOHNATHAN SMITH
Acting Principal Deputy Assistant Attorney General
Civil Rights Division

REBECCA B. BOND
Acting Deputy Assistant Attorney General
Civil Rights Division

/s/ Jacki L. Anderson
T. CHRISTIAN HERREN, JR.
TIMOTHY F. MELLETT
DANIEL J. FREEMAN
JANIE ALISON (JAYE) SITTON
MICHELLE RUPP
JACKI L. ANDERSON
JASMIN LOTT
HOLLY F.B. BERLIN
Attorneys, Voting Section
Civil Rights Division
U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington, DC 20530

CERTIFICATE OF SERVICE

I hereby certify that on August 1, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of this filing to counsel of record.

/s/ Jacki L. Anderson

Jacki L. Anderson

Voting Section

Civil Rights Division

U.S. Department of Justice

Jacki.anderson@usdoj.gov